

2018 NOV -1 AM 11: 41

September 27, 2018

Direct: (213) 452-6550

VIA U.S. MAIL AND E-MAIL

Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination and Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20436
Email: CELA@fec.gov

Re: FEC MUR 7448

Dear Mr. Jordan:

We are writing as counsel to the California Democratic Party and its Treasurer, Katherine Moret, in response to the complaint filed by the National Legal and Policy Center on or about August 1, 2018 ("the "Complaint"), in MUR 7448.

Introduction

The Complaint was filed against the California Democratic Party ("CDP") and its Treasurer, Katherine Moret; Citizens for Waters and its Treasurer, David L. Gould; and Kamala Harris for Senate and its Treasurer, Stephen J. Kaufman, alleging violations of the contribution limits set forth in Sections 431(8)(A)(i), 432(e)(3) and 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 CFR 100.52.¹ The Complaint alleges that a \$35,000 payment made by the CDP to Citizens for Waters for a slate mailer featuring Kamala Harris was an illegal "coordinated" contribution exceeding the Party's \$5,000 contribution limit.

However, the Complaint completely overlooks and fails to acknowledge the existence of the CDP's separate "coordinated party expenditure" limit, which allowed the CDP to make the payment to Citizens for Waters on behalf of Kamala Harris for Senate in connection with the November 8, 2016 General Election. (See 52 U.S.C. 30116(d) and 11 C.F.R. 109.30, 109.32-109.34.) The payment was within the CDP's coordinated expenditure limit for the 2016 General Election, and was timely and properly disclosed by the CDP and Citizens for Waters on their campaign reports. Therefore, the Complaint does not provide any basis for asserting a violation of the Act or Commission regulations, and the Commission should immediately dismiss the complaint as to all respondents.

¹ The Complaint refers to the prior statutory provisions. These sections have been renumbered as 52 U.S.C. §§ 30101(8)(A)(i), 30102(e)(3) and 30116(a)(2)(A).

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Analysis

The CDP (FEC ID#C00105668) is the federally registered state party committee of the Democratic Party in California. A state party committee may contribute up to \$5,000 per election to a U.S. Senate candidate. Separate and in addition to this contribution limit, a state party committee may make “coordinated party expenditures” in connection with the general election of a federal candidate. (52 U.S.C. 30116(d); 11 C.F.R. 109.30, 109.32-109.34.) A state party committee may pay for goods or services (including communications) on behalf of a federal candidate, up to the applicable “coordinated party expenditure” limit.

The Commission has provided guidance explaining the difference between the party’s use of its contribution limit and its coordinated party spending authority, as follows: “In making a coordinated party expenditure, the party committee pays for goods or services in coordination with a candidate but does not give the money directly to the candidate or candidate committee. *For example, the payment of a campaign bill could be treated and reported as a coordinated party expenditure . . .*”² Accordingly, the Act, FEC regulations and Commission guidance are all clear that a state party can use its coordinated spending authority outside of its \$5,000 per election contribution limit, to pay a bill on behalf of a general election candidate for U.S. Senate in the state.

The coordinated party expenditure limit for a Senate candidate is calculated as follows: state voting age population x 2 cents, increased by the COLA; or \$20,000 increased by the COLA, whichever is greater. (52 U.S.C. 30116(d); 11 C.F.R. 109.32.) Based on the statutory formula, the CDP’s “coordinated party expenditure” limit during the 2016 election cycle applicable to a candidate for United States Senate was \$2,886,500.

(https://transition.fec.gov/info/charts/cpe_2016.shtml.)

In 2016, Kamala Harris was the endorsed candidate of the CDP and the Democratic nominee for the office of United States Senator in the November 8, 2016 General Election.³ For the 2016 election cycle, the CDP spent a total of \$1,343,244.18 in “coordinated party expenditures” on behalf of Kamala Harris in connection with the general election in accordance with 52 U.S.C. § 30116(d). Kamala Harris prevailed in the general election and is now a current United States Senator from California. Kamala Harris for Senate (FEC ID# C00571919) is Senator Harris’ principal campaign committee.

Citizens for Waters (FEC ID#C00167585) is the principal campaign committee of Congresswoman Maxine Waters. In accordance with California law, Citizens for Waters produces and distributes a “slate mailer” known as the *Congresswoman Maxine Waters Sample Ballot and Voter Recommendations*, featuring federal and non-federal candidates appearing on the ballot. Pursuant to the FEC in Advisory Opinion 2004-37 (Waters), a payment made by a federal candidate to Citizens for Waters for the proportionate costs of his or her appearance in the slate mailer is not considered a contribution to Citizens for Waters.

² Federal Election Commission, Campaign Guide for Political Party Committees at 48 (Aug. 2013), available at <https://www.fec.gov/resources/cms-content/documents/partygui.pdf> (emphasis added).

³ Because of California’s “Top Two” primary system, Senator Harris was actually one of two Democrats competing in the November 8, 2016 General Election.

For the November 6, 2018 general election, Citizens for Waters requested payment from Kamala Harris for Senate in the amount of \$35,000, for the proportionate cost of the Waters' slate mailer attributable to Kamala Harris. The CDP issued a \$35,000 payment to Citizens for Waters on October 13, 2016 for Sen. Harris' appearance in the general election slate mailer. The CDP disclosed that payment as a "Coordinated Party Expenditure" on Schedule F for Line 25 of the Committee's 12 Day Pre-General Report for the period 10/1/16-10/19/16. The report indicated that the payment was made on behalf of Kamala Harris, and described the payment as "Fair share of slate mailer." (A true and correct copy of the cover page and relevant page from the CDP's 12 Day Pre-General Report is attached as Exhibit "A".)⁴

As is evident from the Complaint, Citizens for Waters disclosed the \$35,000 payment received from the CDP as a slate mailer payment on Schedule A for Line 15 on its 12 Day Pre-General Report, and on its Slate Mailer Organization Campaign Statement (Form 401) filed under California law. (See relevant pages of Citizens for Waters reports, submitted with the Complaint and reattached here for convenience collectively as Exhibit "B".)⁵

The Complaint alleges that the payment made by the CDP to Citizens for Waters for the appearance of Kamala Harris on the slate mailer was an excess contribution that did not qualify as an "exempt party activity." (see 11 CFR §§100.80, 100.140.) Respondents do not dispute that this payment is not an "exempt party activity." However, as is evident from this response and the supporting materials – including the Complaint itself -- the \$35,000 payment made by the CDP to Citizens for Waters was a proper "coordinated party expenditure" under 52 U.S.C. § 30116(d), and was properly and timely reported as such by the CDP. Therefore, the Complaint is baseless.

Conclusion

For the reasons described herein, the Complaint does not contain any factual or legal basis for asserting a possible violation of the Act by respondents. The CDP made a proper payment for the general election on behalf of Kamala Harris within its "coordinated party expenditure" limit, and the payment was properly disclosed by the CDP and Citizens for Waters on their 12 Day Pre-General Reports. In filing this Complaint, the National Legal and Policy Center has either completely misconstrued the law or purposefully chosen to ignore the key statute and regulations providing the basis for this payment.

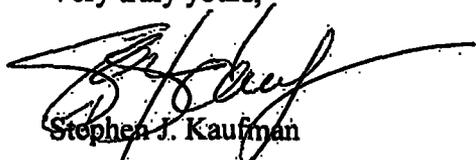
⁴ The CDP originally described the expenditure as a "slate mailer" payment and then amended its 12 Day Pre-General Report to add the "Fair Share" language.

⁵ Citizens for Waters reported the payment on its 12 Day Pre-General Report as received from the Democratic State Central Committee of California FFA, the name on the bank account used by the CDP for its federal program.

Jeff S. Jordan
September 27, 2018
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Therefore, we respectfully request that the Commission find no reason to believe a violation has occurred, and dismiss this Complaint in its entirety with no further action against respondents.

Very truly yours,



Stephen J. Kaufman

Enclosures

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EXHIBIT "A"

4000444/44/410

SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) California Democratic Party					
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Full Name of Subordinate Committee			
If YES, name the designating committee: California Democratic Party		Mailing Address			
		City		State	ZIP Code
Full Name (Last, First, Middle Initial) of Each Payee Bertolina & Barnato Consulting			<input type="checkbox"/> Memo Item		Purpose of Expenditure Finance Consulting
Mailing Address 1005 12th Street Suite H					Category/ Type 001
City Sacramento		State CA	Zip Code 95814-3940		Date 10 / 13 / 2016
Name of Federal Candidate Supported Harris, Kamala, . .		Office Sought:	<input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: CA District: _____	Amount 850.00
Aggregate General Election Expenditure for this Candidate ▶			784399.27		Transaction ID : EDTFALC7293
Full Name (Last, First, Middle Initial) of Each Payee Caple, Elena, . .			<input type="checkbox"/> Memo Item		Purpose of Expenditure salary
Mailing Address 5600 Wilshire Blvd,#434					Category/ Type 001
City Los Angeles		State CA	Zip Code 90036		Date 10 / 14 / 2016
Name of Federal Candidate Supported Harris, Kamala, . .		Office Sought:	<input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: CA District: _____	Amount 2029.16
Aggregate General Election Expenditure for this Candidate ▶			784399.27		Transaction ID : EDTFALC7294
Full Name (Last, First, Middle Initial) of Each Payee Citizens For Waters			<input type="checkbox"/> Memo Item		Purpose of Expenditure Payment for Fair share of slate mailer (K.Harris,USSen)
Mailing Address 3700 Wilshire Blvd. Suite 1050B					Category/ Type 001
City Los Angeles		State CA	Zip Code 90010-3015		Date 10 / 13 / 2016
Name of Federal Candidate Supported Harris, Kamala, . .		Office Sought:	<input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: CA District: _____	Amount 35000.00
Aggregate General Election Expenditure for this Candidate ▶			784399.27		Transaction ID : EDTFALC7292
SUBTOTAL of Expenditures This Page (optional).....▶					37879.16
TOTAL This Period (last page this line number only).....▶					

19044474748

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

California Democratic Party

ADDRESS (number and street) 1830 9th Street

Check if different than previously reported. (ACC) Sacramento CA 95811

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00105668

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- | | | | |
|--------------------------------------|--------------------------------------|---------------------------------------|--|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8) | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9) | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE) |

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S)

Election on MM / DD / YYYYYY in the State of AA

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

Election on MM / DD / YYYYYY in the State of AA

5. Covering Period MM / DD / YYYYYY through MM / DD / YYYYYY

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Moret, Katherine, . .

Type or Print Name of Treasurer

Signature of Treasurer Moret, Katherine, . . [Electronically Filed] Date MM / DD / YYYYYY

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

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SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) California Democratic Party	
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If YES, name the designating committee: California Democratic Party	Full Name of Subordinate Committee Mailing Address City State ZIP Code
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item Bertolina & Barnato Consulting	Purpose of Expenditure Finance Consulting Category/Type: 001
Mailing Address 1005 12th Street Suite H	Date: 10 / 13 / 2016
City Sacramento State CA Zip Code 95814-3940	Amount: 850.00
Name of Federal Candidate Supported Harris, Kamala, . . Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential State: CA District: _____	Aggregate General Election Expenditure for this Candidate ▶ 784399.27 Transaction ID : EDTFALC7293
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item Caple, Elena, . .	Purpose of Expenditure salary Category/Type: 001
Mailing Address 5600 Wilshire Blvd.#434	Date: 10 / 14 / 2016
City Los Angeles State CA Zip Code 90036	Amount: 2029.16
Name of Federal Candidate Supported Harris, Kamala, . . Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential State: CA District: _____	Aggregate General Election Expenditure for this Candidate ▶ 784399.27 Transaction ID : EDTFALC7294
Full Name (Last, First, Middle Initial) of Each Payee <input type="checkbox"/> Memo Item Citizens For Waters	Purpose of Expenditure slate mailer (K.Harris,USSen) Category/Type: 001
Mailing Address 3700 Wilshire Blvd. Suite 1050B	Date: 10 / 13 / 2016
City Los Angeles State CA Zip Code 90010-3015	Amount: 35000.00
Name of Federal Candidate Supported Harris, Kamala, . . Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential State: CA District: _____	Aggregate General Election Expenditure for this Candidate ▶ 784399.27 Transaction ID : EDTFALC7292
SUBTOTAL of Expenditures This Page (optional).....▶	37879.16
TOTAL This Period (last page this line number only).....▶	

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EXHIBIT "B"

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. CITIZENS FOR WATERS

12FE4M5

ADDRESS (number and street) 249 E Ocean Blvd # 685 Long Beach CA 90802 CITY STATE ZIP CODE

Check if different than previously reported. (ACC)

2. FEC IDENTIFICATION NUMBER C00167585 3. IS THIS REPORT NEW (N) OR AMENDED (A) STATE DISTRICT CA 43

4. TYPE OF REPORT (Choose One) (a) Quarterly Reports: April 15 Quarterly Report (Q1) July 15 Quarterly Report (Q2) October 15 Quarterly Report (Q3) January 31 Year-End Report (YE) Termination Report (TER)

(b) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S) Election on 11/08/2016 in the State of CA (c) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S) Election on / / in the State of

5. Covering Period 10/01/2016 through 10/19/2016

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Type or Print Name of Treasurer GOULD, DAVID, , ,

Signature of Treasurer GOULD, DAVID, , , [Electronically Filed] Date 12/08/2016

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 9 OF 24

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input checked="" type="checkbox"/> 15
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
CITIZENS FOR WATERS

A. Full Name (Last, First, Middle Initial)
Californians for Lower Drug Prices

Mailing Address 6255 W Sunset Blvd 21st Floor

City Los Angeles	State CA	Zip Code 90028
---------------------	-------------	-------------------

FEC ID number of contributing federal political committee. **C**

Name of Employer _____ Occupation _____

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼
 _____ 20000.00

Date of Receipt
 M M / D D / Y Y Y Y
 10 / 15 / 2016

Transaction ID : 15-6741-O

Amount of Each Receipt this Period
 _____ 20000.00

Memo Item
 State Mailer Payment

B. Full Name (Last, First, Middle Initial)
Democratic State Central Committee of California FFA

Mailing Address 1830 9th St

City Sacramento	State CA	Zip Code 95811
--------------------	-------------	-------------------

FEC ID number of contributing federal political committee. **C**

Name of Employer _____ Occupation _____

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼
 _____ 35000.00

Date of Receipt
 M M / D D / Y Y Y Y
 10 / 17 / 2016

Transaction ID : 15-6742-O

Amount of Each Receipt this Period
 _____ 35000.00

Memo Item
 State Mailer Payment

C. Full Name (Last, First, Middle Initial)
For Adult Industry Responsibility Committee

Mailing Address 6255 W Sunset Blvd 21st Floor

City Los Angeles	State CA	Zip Code 90028
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FEC ID number of contributing federal political committee. **C**

Name of Employer _____ Occupation _____

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼
 _____ 20000.00

Date of Receipt
 M M / D D / Y Y Y Y
 10 / 15 / 2016

Transaction ID : 15-6740-O

Amount of Each Receipt this Period
 _____ 20000.00

Memo Item
 State Mailer Payment

SUBTOTAL of Receipts This Page (optional).....▶	_____ 75000.00
TOTAL This Period (last page this line number only).....▶	_____

10034744001

Slate Mailer Organization Campaign Statement

(Government Code Sections 84218-84219)

Type or print in Ink.

COVER PAGE

Date Stamp	Statement Covers Period from <u>09/25/2016</u> through <u>10/22/2016</u>



SEE INSTRUCTIONS ON REVERSE

I Slate Mailer Organization Information

FULL NAME OF SLATE MAILER ORGANIZATION:

CITIZENS FOR WATERS

ID NUMBER

1271833

ADDRESS NO AND STREET

CITY STATE ZIP CODE PHONE NUMBER

Los Angeles CA 90010

NAME OF TREASURER

David Gould

ADDRESS NO AND STREET

CITY STATE ZIP CODE DAYTIME PHONE NUMBER

Los Angeles CA 90010

III Summary of Payments

1	TOTAL PAYMENTS RECEIVED	\$ 155000.00	(A) Total This Period	\$ 155000.00	(B) Cumulative to Date (Since January 1 of calendar year covered)	\$ 258000.00
2	TOTAL PAYMENTS MADE	\$ 2500.00	(A) Total This Period	\$ 2500.00	(B) Cumulative to Date (Since January 1 of calendar year covered)	\$ 96250.00

IV Verification

I have used all reasonable diligence in preparing this statement. I have reviewed the statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/25/2016 At _____ City and State

By David L. Gould Signature of Responsible Officer

Name of Responsible Officer David L. Gould Title: Treasurer

FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE

INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT FOR SLATE MAILER ORGANIZATIONS

**Schedule A
Payments Received**

Statement covers period
 from 09/25/2016
 through 10/22/2016
 I.D NUMBER
1271833
 3/6



SEE INSTRUCTIONS ON REVERSE
 NAME OF SLATE MAILER ORGANIZATION:

CITIZENS FOR WATERS

(1) DATE RECEIVED	(2) IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	(3) (a) NAME, OFFICE SOUGHT, AND JURISDICTION OF CANDIDATE/ MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)		(b) CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MAILER		(4) AMOUNT RECEIVED THIS PERIOD	(5) CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE	
		SUPPORT	OPPOSE					
10/17/2016 	Democratic State Central Committee of California FFA Sacramento CA 95811 Reference No:	Kamala Harris Other - U.S. Senate		X		35000.00	35000.00	
10/17/2016 	Susan Jung Townsend for Judge 2016 Long Beach CA 90802 Reference No:	Susan Jung Townsend Superior Court Judge Los Angeles County		X		10000.00	20000.00	
10/19/2016 	Hall for Congress 2016 Long Beach CA 90802 Reference No:	Isadore Hall Other - U.S. House of Representatives		X		7500.00	27500.00	
Summary							SUBTOTAL	\$

- Amount Received - Payments of \$100 or More (include all Schedule A subtotals) \$ _____
- Amount Received - Payments of Less than \$100 (Not itemized) \$ _____
- Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1 \$ _____

Schedule A Payments Received

SCHEDULE A
CALIFORNIA
1992 FORM 401

Statement covers period
from 09/25/2016
through 10/22/2016

SEE INSTRUCTIONS ON REVERSE.

NAME OF SLATE MAILER ORGANIZATION:

CITIZENS FOR WATERS

I.D NUMBER

1271833

4/6

(1) DATE RECEIVED	(2) IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	(3) (a) NAME, OFFICE SOUGHT, AND JURISDICTION OF CANDIDATE/ NAME, JURISDICTION, AND NUMBER OR LETTER OF BALLOT MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	(b) CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MAILER		(4) AMOUNT RECEIVED THIS PERIOD	(5) CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE
			SUPPORT	OPPOSE		
10/19/2016	Safe, Clean Neighborhood Parks And Open Space for All Los Angeles CA 90017 Reference No:	Los Angeles County A	X		7500.00	7500.00
10/19/2016	Yes On The Los Angeles County Traffic Improvement Plan Los Angeles CA 90017 Reference No:	Los Angeles County M	X		35000.00	35000.00
10/21/2016	Saves Lives California, A Coalition of Doctors, Dentists, Health Plans, Labor, And Sacramento CA 95814 Reference No:	Non-Profit Health Advocate Organizations Statewide 56	X		10000.00	10000.00
Summary					SUBTOTAL	\$ 155000.00

1. Amount Received - Payments of \$100 or More (Include all Schedule A subtotals)

2. Amount Received - Payments of Less than \$100 (Not itemized)

3. Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1

SCHEDULE B

Schedule B
Payments Made

Statement covers period from 09/25/2016 through 10/22/2016		CALIFORNIA 1992 FORM 401
		5/6
		I.D NUMBER 1271833

SEE INSTRUCTIONS ON REVERSE
 NAME OF SLATE MAILER ORGANIZATION:
 CITIZENS FOR WATERS

NAME AND STREET ADDRESS OF PAYEE	DESCRIPTION OF PAYMENT	AMOUNT PAID
Gould & Orellana, LLC Long Beach Reference No: CA 90802	Political Reporting Services	2500.00

Summary	SUBTOTAL \$
1. Payments of \$100 or More (Include all Schedule B subtotals)	\$ 2500.00
2. Payments under \$100 This Period (Not itemized)	\$ 0.00
3. Total Payments This Period (Line 1 + Line 2). Enter here and in Column A, Line 2, of the Summary of Payments section on Page 1.	\$ 2500.00

Schedule C Persons Receiving \$1,000 Or More



Statement covers period
from 09/25/2016
through 10/22/2016

6/6

I.D. NUMBER
1271833

SEE INSTRUCTIONS ON REVERSE

NAME OF SLATE MAILER ORGANIZATION:

CITIZENS FOR WATERS

You must identify each individual listed on your Statement of Organization (Form 400) who received, directly or indirectly, \$1,000 or more from the organization during the period. (See Instructions on reverse regarding "indirect" payments.)

NAMES OF INDIVIDUALS RECEIVING \$1,000 OR MORE	AMOUNT THIS PERIOD	CUMULATIVE SINCE JANUARY 1
Gould & Orellana, LLC	2500.00	2500.00